

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No.3:23-cv-0192

Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Alistair Newbern

DECLARATION OF BART HERBISON
IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

I, Bart Herbison, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

INTRODUCTION

1. I am the Executive Director of the Nashville Songwriters Association International ("NSAI"). I have served in this role since 1997.
2. I submit this declaration in support of Plaintiffs' Motion for a Preliminary Injunction. I have knowledge of the facts stated herein based on personal knowledge and my review of the documents, files, websites, and other items referenced herein. If called upon to do so, I am able to testify competently to the matters as stated herein.

NSAI AND ITS BOARD

3. NSAI is the world's largest not-for-profit songwriters trade association. Established in 1967, NSAI's membership of approximately 4,000 active and professional members spans the United States and foreign countries. NSAI is dedicated to protecting the rights of and serving aspiring and professional songwriters in all genres of music.

4. The Board of Directors of NSAI is comprised of 27 individuals, each is a highly successful and decorated professional songwriter. Collectively, they have penned numerous chart-topping and platinum-selling hits, writing for most major performing artists in country music as well as many artists from other genres including pop, rock and soul. They have received every major songwriting award in the industry, including multiple GRAMMYs, American Country Music Awards, ASCAP Songwriter of the Year, BMI Songwriter of the Year, the Country Music Association Triple Crown, inductions into the Nashville Songwriters Hall of Fame, and more. Together, their songs have appeared on recordings with hundreds of millions of combined sales. Individually, our Board Members' biographies are impressive; collectively, they are astounding. Biographies of each Board Member can be found at:

<https://www.nashvillesongwriters.com/board-directors>.

STATEMENT ON CLAUDE AI

5. The NSAI Board is extremely concerned about the potential short term and long-term harmful impacts of Anthropic's new artificial intelligence model Claude. The Board has therefore executed the attached Statement setting forth its views. Every Member of the Board agreed to the Statement in a direct communication with me.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my personal knowledge and belief.

Executed in Nashville, Tennessee on 11/9/2023.



BART HERBISON

CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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